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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

No. 4:22-md-03047-YGR

MDL No. 3047

This Document Relates to:  
  
ALL ACTIONS

**STIPULATION AND [PROPOSED] ORDER  
EXTENDING SCHEDULE CONCERNING  
PROPOSED PRESERVATION ORDER**

Pursuant to Civil Local Rules 6-1(b) and 6-2, the Parties, through their undersigned counsel, hereby stipulate and respectfully request that the Court extend the deadlines that were adopted with respect to the Preservation Order [ECF Nos. 386, 390], as follows:

1 WHEREAS, on October 13, 2023, the parties filed a joint discovery letter summarizing  
 2 the MDL and the pending disputes and proposing a schedule for further negotiations and  
 3 resolution of disputes over a proposed Preservation Order [ECF No. 386];  
 4

5 WHEREAS, on October 17, 2023, the Court adopted the parties' proposed meet and  
 6 confer schedule with respect to the Preservation Order [ECF No. 390], as follows:  
 7

- 8 1. October 20: Defendants provide Plaintiffs with an updated proposed  
 Preservation Order;
- 9 2. Between October 21-31: Parties meet and confer to the extent necessary to  
 10 clarify Defendants' revisions;
- 11 3. November 1: Plaintiffs provide Defendants with a redline to the updated  
 12 proposed Preservation Order;
- 13 4. Between November 2-10: Parties meet and confer regarding outstanding  
 14 disputes; and
- 15 5. November 15: Parties submit a joint status report in which they either offer a  
 16 joint proposal for briefing the remaining disputes or submit competing  
 proposals with respect to briefing.

17 WHEREAS, on October 20, 2023, Defendants provided Plaintiffs with an updated  
 18 proposed Preservation Order, together with information regarding Defendants' data sources and  
 19 tools; and

20 WHEREAS, Plaintiffs requested additional time to respond to Defendants, and  
 21 Defendants agreed, provided that other dates in the schedule be extended.

22 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO  
 23 THE COURT'S APPROVAL, THAT THE SCHEDULE ADOPTED AT ECF No. 390 IS  
 24 MODIFIED AS FOLLOWS:

- 25 1. November 13: Plaintiffs provide Defendants with a redline to the updated  
 26 proposed Preservation Order;
- 27 2. Between November 14-December 6 (excluding the week of Thanksgiving):  
 28 Parties meet and confer regarding outstanding disputes; and

3. December 11: Parties submit a joint status report in which they either offer a joint proposal for briefing the remaining disputes or submit competing proposals with respect to briefing.

Dated: November 11, 2023

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Google LLC, and Alphabet Inc.*

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Peter H. Kang  
United States Magistrate Judge

**SIGNATURE CERTIFICATION**

Pursuant to Civ. L. R. 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

Dated: November 11, 2023

/s/ Christopher A. Seeger

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